



September 18, 2017

Request for Review

Before the
Federal Communications Commission
Washington, D.C. 20554

CC Docket No. 02-06, 13-184 and 96-45

To Whom It May Concern:

At the request of Mark Nadel, FCC Attorney Advisor, the Redding School District respectfully submits an additional supplement to the FCC Appeal originally filed on July 14, 2017, with the first supplement filed on August 23, 2017 for a request for reconsideration of the amounts committed for two Funding Request Numbers on the Funding Commitment Decision Letter issued on 8/12/2016 for the following FCC Form 471 and its respective FRNs:

Appellant/Organization Name	Redding School District
Billed Entity Number	144783
FCC Form 471 Number	161031573
Funding Request Numbers:	1699065357, 1699065296

An FCC Appeal for this request was filed on July 14, 2017 and a supplement on August 23, 2017. The Redding School District would like to provide additional information and clarification regarding the Ministerial and Clerical errors which led to the incorrect funding amounts being indicated on the 2016 Form 471 application for BOTH Funding Requests associated with this Appeal.

FIRST FRN 1699065357:

As indicated in the previously submitted Appeal, Redding School District, Shasta Union Elementary School District and Igo-Ono-Platina Elementary School District are three very small rural school districts located in Shasta County, California that share staff for internal responsibilities such as Accounts Payable. For expediency purposes, services such as telecommunications and internet access services for all three school districts are billed under Redding School District's Name and Redding School District Office's address because this is the location of the staff and Accounts Payable department for all three school districts. Although the invoices for all three districts are received at one location, the payment of each service is paid out of the respective school district's account – the only commonality is the central location of the Accounts Payable department for all three districts.

While this is certainly not a normal practice in most regular school districts, it is a system that is necessary and beneficial for Redding Elementary School District, Shasta Union Elementary School District and Igo-Ono-Platina Elementary School District so that these three small school districts can remain operational in the most efficient way.

Unfortunately, this unusual system was the reason for the Ministerial and Clerical error which led to the incorrect funding amount to be indicated on Redding School District's Form 471 application 161031573 for **FRN 1699065357** for cellular voice services. A cellular invoice that belonged to Shasta Union Elementary School District, a much smaller district than Redding School District, was inadvertently used as the source documentation when filling out

the FRN details. This inadvertent error was because invoices for all three school districts indicate Redding School District as the billed account name and address, and the wrong individual account number details were used.

The cellular invoice for Shasta Union Elementary School District (an attachment titled "[Shasta UESD Verizon Wireless Invoice.pdf](#)" in the previously submitted appeal documents), which was *inadvertently used* to calculate Redding School District's costs, shows a monthly recurring charge of \$19.58, therefore, Funding Request for **FRN 1699065357** on Redding School District's 471 application was as shown below:

Incorrect Cost Calculation

Monthly Cost

Unit Cost	\$19.58
Ineligible Unit Costs	\$ -
Ineligible Monthly cost	
Eligible Monthly Costs	\$19.58
Monthly Quantity	1
Total Eligible MRC	\$19.58
Months of Service	12
Total Eligible Recurring Cost \$234.96	

The actual cellular invoice that belongs to Redding School District (an attachment titled "[Redding SD Verizon Wireless Invoice.pdf](#)" in the previously submitted appeal documents) shows a monthly recurring cost of \$2,361.27 of which the E-rate eligible monthly cost is \$632.07. Therefore, the correct Funding Request for **FRN 1699065357** on Redding School District's 471 application should have been:

Correct Cost Calculation

Monthly Cost

Unit Cost	\$9.41
Ineligible Unit Costs	\$26.20
Ineligible Monthly cost	\$1,729.20
Eligible Monthly Costs	\$620.83
Monthly Quantity	66
Total Eligible MRC	\$621.06
Months of Service	12
Total Eligible Recurring Cost \$7,452.72	

Please see the attached document titled "[Redding SD Verizon Wireless Invoice Cost Calculations.pdf](#)" which has been prepared in order to show details regarding the eligible and ineligible charges on Redding ESD's invoice associated with **FRN 1699065357**.

Please note that all of the correct source documentation referenced in this appeal was available prior to the filing and certification of the 2016 Form 471 #161031573. The error was simply a result of using the incorrect source documentation when inputting costs into the Form 471 application.

SECOND FRN 1699065296:

To support the Ministerial and Clerical Error that was made during the application preparation process for **FRN 1699065296**, it was indicated in the previous appeal and supplement, that there are a total of nine account numbers for Redding School District under AT&T for Local Voice services, and that one of the account numbers was mistakenly omitted when calculating the total cost of all Local Voice accounts for Redding Elementary School.

The total E-rate eligible monthly recurring charges for the eight accounts that were used to calculate costs were as shown below:

Cost Calculation

Monthly Cost

Unit Cost	\$10.62	
Ineligible Unit Costs	\$1.22	
Ineligible Monthly cost	\$41.40	
Eligible Monthly Costs	\$360.82	
Monthly Quantity		34
Total Eligible MRC	\$361.08	
Months of Service		12
Total Eligible Recurring Cost \$4,332.96		

However, the ninth account number which was inadvertently omitted, contained 181 additional local voice lines and additional charges, and, if included, would have changed the true Funding Request amount for **FRN 1699065296** to:

Cost Calculation

Monthly Cost

Unit Cost	\$15.31	
Ineligible Unit Costs	\$0.73	
Ineligible Monthly cost	\$157.93	
Eligible Monthly Costs	\$3,291.50	
Monthly Quantity		215
Total Eligible MRC	\$3,291.65	
Months of Service		12
Total Eligible Recurring Cost \$39,499.80		

Because forgetting to enter an account number from the source list is an error that is difficult to demonstrate, Redding School District would like to reference the attached document titled "[Redding ESD AT&T Local Voice Accounts.pdf](#)". This document shows that the source documentation was available prior to the filing and certification of the Form 471. This document contains the invoices for all **nine** Local Voice account numbers for Redding School District with AT&T. The last account number, referenced on page 118, is the account number from the source documentation that was mistakenly omitted from the Funding Request's pre-discount cost calculation.

In addition, as stated previously, Form 471 applications typically undergo a Program Integrity Assurance Review process prior to issuance of a Funding Commitment Decision Letter, during which time the applicant has an opportunity to review specific areas of the application and an opportunity to submit corrections needed to be made directly to a USAC PIA reviewer. Redding School District's 471# 161031573 did undergo such a review, however, neither of the Funding Request Numbers in question (FRN 1699065357, FRN 1699065296) were included as part of the review process and, therefore, Redding was not afforded this additional opportunity to identify the Ministerial and Clerical errors associated with these FRNs and as a result, the errors were not discovered until after the FCDL was issued and preparation for invoicing began.

As stated previously, the information outlined in this document clearly demonstrates that the errors made during the Form 471 filing process were simply errors made during the preparation and filing the Form 471 application and fall within USAC's scope and definition of correctable Ministerial and Clerical Errors. The errors were simply the use of incorrect source documentation and given the extraordinary circumstances present in the three small school districts, we hope it is easy to understand how these errors occurred. The information in this document also clearly demonstrates that the information being requested in the increase of costs for each FRN was, in fact, available prior to the filing and certifying of the Form 471. The Redding School District is not asking for funds to be increased due to costs incurred after the filing of the Form 471, but on the contrary, the District respectfully asks that the true and correct costs of the eligible services at the time the 471 application and its associated Funding Requests were filed to be corrected and a Revised Funding Commitment Decision Letter be issued.

Sincerely,
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